

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

V.

SEAN COMBS,

Defendant.

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**DECLARATION OF THOMAS B. SULLIVAN IN SUPPORT OF NON-PARTY
WARNER BROS. DISCOVERY'S MOTION TO QUASH SUBPOENA**

Thomas B. Sullivan, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a partner in the law firm of Ballard Spahr LLP, counsel Non-party Warner Bros. Discovery, Inc. (“WBD”) in the above-captioned action. I submit this declaration in support of WBD’s motion to quash a subpoena served on by Defendant Sean Combs. I have personal knowledge of the facts herein.

2. Attached hereto as **Exhibit A** is a true and correct copy of the subpoena served by counsel for Mr. Combs on WBD, with the names of Individuals A and B redacted.

3. Pursuant to Local Criminal Rule 16.1, I certify that I, along with my colleague Paul Safier, met and conferred with Mr. Combs's counsel Anna Estevao on March 24, 2025, March 25, 2025, and April 2, 2025 by videoconference in an effort in good faith to resolve by agreement the issues raised by the motion without the intervention of the Court but we have been unable to reach agreement as to all issues. During the meet and confer, the parties were able to resolve issues related to two of the three topics in the subpoena, as Mr. Combs was able to obtain them from an alternate source. The remaining issue is addressed in this motion.

4. To allow the meet and confer discussions to occur, counsel for Mr. Combs agreed to extend the response date for the subpoena to April 8, 2025.

5. Attached hereto as **Exhibit B** is a true and correct copy of email correspondence between counsel reflecting the parties agreement to extend the response deadline.

6. Attached hereto as **Exhibit C** is a true and correct copy of *United States v. Grant*, 2004 U.S. Dist. LEXIS 28176 (S.D.N.Y. Nov. 17, 2004), an opinion which does not appear to be available on Westlaw.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 8, 2025.

s/Thomas B. Sullivan
Thomas B. Sullivan